

# Exhibit A

LAW OFFICE OF  
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April 1, 2020

**By Email**  
Warden Derek Edge  
MDC Brooklyn  
80 29<sup>th</sup> Street  
Brooklyn, NY

Re: Request for Reduction in Sentence/Compassionate Release  
for Nkanga Utuk Nkganga (Reg. No. 86195-054)

Dear Warden Edge,

Please accept this request for a reduction in sentence pursuant to 18 U.S.C. § 3582 on behalf of inmate **Nkanga Utuk Nkanga, Reg. No. 86195-054**. Given the extraordinary and compelling circumstances created by the ongoing coronavirus pandemic, Dr. Nkanga is not able to file this request himself.

Dr. Nkanga seeks a reduction in sentence based on his severe respiratory ailment, which places him at significantly greater risk of contracting and/or suffering acutely from COVID-19, according to the Centers for Disease Control.<sup>1</sup> Dr. Nkanga has a history of respiratory illness putting him at high risk should he be infected with COVID-19. He has been treated for severe respiratory ailments, which have left him short of breath in recent months, even before this virus became a threat. Dr. Nkanga is also 67 years old; his age alone places him at high risk. Dr. Nkanga's risk is heightened by the particular circumstances at MDC, which presents an ideal situation for COVID-19 to spread. There is already one confirmed positive inmate, and several other inmates are being monitored for symptoms. Counsel understands that as of yesterday at least two units at the MDC were isolated or in quarantine. At the MDC, Dr. Nkanga cannot practice regular hand hygiene, and Dr. Nkanga cannot effectively socially distance himself from other inmates as the CDC cautions every person in the United States to do to stop COVID-19's spread.

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<sup>1</sup> CDC guidance is available at [https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fpeople-at-higher-risk.html](https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fpeople-at-higher-risk.html)

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If released, Dr. Nkanga he would return to live with his girlfriend, Marcia Cohen, at 575 Bloomingdale Road, Staten Island, NY 10309. On April 1, 2020, Ms. Cohen confirmed to Dr. Nkanga's counsel that Dr. Nkanga can reside with her if released.

Please inform us of your decision on this request as soon as you can. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Benjamin Silverman

Daniel Parker

Benjamin Silverman

Joshua Horwitz

*Attorneys for Nkanga Nkanga*